

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CANADA GOOSE INC., a Canadian)	
Corporation,)	
)	
Plaintiff,)	
)	
v.)	CA. NO. 1:17-cv-903 (CMH/TCB)
)	
REGISTRANT OF CANADIAN)	
GOOSE.COM,)	
)	
and)	
)	
JOHN DOES (1-10),)	
)	
Defendants.)	
)	
)	

**PLAINTIFF CANADA GOOSE INC.'S
REQUEST FOR ENTRY OF A DEFAULT**

Plaintiff, Canada Goose Inc. (“Canada Goose”), by counsel and pursuant to Fed. R. Civ. P. 55, hereby requests that the clerk of the Court enter the default of defendant Registrant of CanadianGoose.com (“Registrant”).

In support of this request, plaintiff Canada Goose states that it filed its Complaint on August 9, 2017. (Dkt.1.) On September 12, 2017, Canada Goose filed a Motion for Service by publication. (Dkt. 8.) On September 13, 2017, this Court granted that Motion and entered an Order, which required that a copy of that Order be published in the *Washington Post* or the *Washington Times*, within 14 days of entry of that Order. (Dkt. 11.) In accordance with that Order, a copy of it was published in the *Washington Post* on September 21, 2017. (Dkts. 12, 12-1.) On September 22, 2017, a copy of that Order and the published notice were served on the defendant, Registrant of CanadianGoose.com, via the email address(es) provided in the domain name registration for the Infringing Domain Name at the time of the filing of the Complaint.

(Dkt. 12-2.) The Notice of Publication required that the defendant Registrant of CanadianGoose.com answer or otherwise respond to the Complaint within twenty-one (21) days from the date of publication of that Order. (Dkts. 11, 12-1.)

The time for defendant Registrant of CanadianGoose.com to appear and respond to the Complaint thus ran on October 12, 2017. As of the date of this filing, December 4, 2017, defendant Registrant of CanadianGoose.com has not appeared or responded to the Complaint.

As alleged in the Complaint, this Court has both subject matter and personal or *in rem* jurisdiction over the defendant Registrant. (Dkt. 1, ¶¶ 5, 6, 7) Defendant Registrant of CanadianGoose.com is a business or individual whose actual name is currently unconfirmed and whose true address is currently unknown. (Dkt. 1, ¶ 3.) Upon information and belief, Registrant is the registrant, creator, and operator of the website associated with the domain name CanadianGoose.com, and who, at all relevant times herein, has been engaged in the use of Canada Goose's trademarks and therefore is not an infant, an incompetent person, or a member of the military service of the United States or its Allies. *Id.*

WHEREFORE, plaintiff Canada Goose Inc. requests that the clerk of the Court enter the default of defendant Registrant of CanadianGoose.com.

Dated: December 4, 2017

Respectfully submitted,

/s/ Theresa A. Queen

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of December, 2017, I will electronically file the foregoing with the Court using the CM/ECF system, and that I will cause a copy, along with the Court's NEF, to be delivered to defendant at:

abuse@uniregistry.com
821368@privacy-link.com

/s/ Theresa A. Queen
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